



**FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

February 27, 2015

DA 15-267

Bill Kaplan  
Federal Aviation Administration  
Air Traffic Organization  
800 Independence Ave., S.W.  
Washington, DC 20591

RE: Request for Interpretation of 47 C.F.R. § 87.345 of the Commission's Rules

Dear Mr. Kaplan:

This letter responds to the request for interpretation<sup>1</sup> of Section 87.345 of the Commission's rules<sup>2</sup> that you filed on September 8, 2014 on behalf of the Federal Aviation Administration (FAA) Air Traffic Organization. Specifically, you ask whether power-up of airport vehicle squitters outside the airport movement area is permissible. As set forth below, we conclude that the operation of the equipment in question does not violate the rule.

Aeronautical utility mobile stations for airport surface detection equipment, commonly referred to as vehicle "squitters," help reduce collisions between aircraft and airport ground vehicles by enabling air traffic control to monitor their movement.<sup>3</sup> Section 87.345 states that aeronautical utility mobile stations "provide communications for vehicles operating on an airport movement area," which it defines as "the runways, taxiways and other areas utilized for taxiing, takeoff and landing of aircraft, exclusive of loading ramp and parking areas."<sup>4</sup> Vehicle squitter communications are limited to the airport movement area in order to prevent use of the system for purposes other than vehicle and aircraft safety (such as tracking baggage carts).<sup>5</sup>

In your letter, you state that certain vehicle squitters require time during initial power-up to acquire satellite, almanac and ephemeris data to determine position and time. The acquisition delay can

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<sup>1</sup> Letter dated September 8, 2014 from Bill Kaplan, Federal Aviation Administration Air Traffic Organization, Program Manager, Vehicle ADS-B to Scot Stone, Federal Communications Commission.

<sup>2</sup> 47 C.F.R. § 87.345.

<sup>3</sup> See Amendment of the Commission's Rules Governing Certain Aviation Ground Station Equipment, *Report and Order*, WT Docket No. 10-61, 28 FCC Rcd 2693, 2693 ¶ 1 (2013) (*Squitter Report and Order*).

<sup>4</sup> See 47 C.F.R. § 87.345 introductory paragraph.

<sup>5</sup> See *Squitter Report and Order*, 28 FCC Rcd at 2694 ¶ 4.

range from seconds up to fifteen minutes in duration. You state that permitting vehicle squitters to transmit while initial power-up satellite acquisition is in progress will minimize this delay, ensuring that the vehicle will be under air traffic control surveillance when it enters the airport movement area. Otherwise, vehicle squitters in the airport operation area may not immediately be detected, which poses an operational safety and efficiency risk. The initialization condition is used only until actual position is determined; upon determining position, the squitters will either continue transmitting or cease transmitting depending on whether the squitter is within the airport movement area. You therefore ask whether Section 87.345 permits vehicle squitters to transmit while in transit to the airport movement area during initial power-up or after a power interruption.

We conclude that the initial power-up of these devices outside the airport movement area to determine position and time is in conformance with the rules. Such operation is ancillary to, and in support of, the “communications for vehicles operating on an airport movement area” that the rule authorizes, and contributes to the rule’s purpose of enhancing operational safety of the airport movement area. We therefore clarify that Section 87.345 permits such ancillary operation. This interpretation is consistent with the FAA’s Advisory Circular providing approval and operational guidance for airport vehicle squitter units, which was corrected in 2014 to make clear that it contemplates operations in transit to the airport movement area as needed for squitters to be functioning upon arrival in the airport movement area.<sup>6</sup>

Accordingly, IT IS ORDERED that, pursuant to Sections 4(i) and 5(d) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 155(d), and Section 1.2 of the Commission’s Rules, 47 C.F.R. § 1.2, the request filed by the Federal Aviation Administration Air Traffic Organization on September 8, 2014 IS GRANTED as set forth herein.

This action is taken under delegated authority pursuant to Sections 0.131 and 0.331 of the Commission’s Rules, 47 C.F.R. § 0.131, 0.331.

FEDERAL COMMUNICATIONS COMMISSION

Scot Stone  
Deputy Chief, Mobility Division  
Wireless Telecommunications Bureau

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<sup>6</sup> See Advisory Circular No. 150/5220-26, Airport Ground Vehicle Automatic Dependent Surveillance – Broadcast (ADS-B) Out Squitter Equipment, Federal Aviation Administration, U.S. Department of Transportation, Consolidated to include Change 1. The Commission has stated that the FAA is best positioned to determine the appropriate vehicle squitter deployment at each airport. See *Squitter Report and Order*, 28 FCC Rcd at 2695 ¶ 6.